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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: L'ORÉAL WRINKLE CREAM
MARKETING PRACTICES
LITIGATION

MDL 2415

Master Docket No: 2:12-cv-3571
(WJM)(MF)

This Document Relates To: ALL CASES

ECF Case

NOTICE OF MOTION

Return Date: July 15, 2013
Oral Argument Requested

PLEASE TAKE NOTICE that on July 15, 2013, or as soon thereafter as counsel may be heard, Defendants L'Oréal USA, Inc., Lancôme, Inc. and Lancôme Luxury Products, LLC ("L'Oréal"), by and through its attorneys Debevoise & Plimpton LLP, will move before the Honorable William J. Martini, United States District Judge, for an Order granting Defendants' Motion to Dismiss the Master Consolidated Complaint, and for such other relief as the Court may award.

PLEASE TAKE FURTHER NOTICE that, in support of their Motion, L'Oréal relies on the arguments presented in the Memorandum of Law in Support of Defendants' Motion to Dismiss, the pleadings of the record, any reply brief to be submitted herein, and oral argument which is specifically requested. Also submitted herewith for the Court's consideration is a proposed form of Order.

DATED: April 26, 2013

Respectfully submitted,

/s/ Jeffrey S. Jacobson
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